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BY ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Rayne Valentine v. City of New York, et al.* - 21-CV-4867 (EK) (VMS)

Your Honor:

I write to provide the detailed discovery plan the Court has directed the parties to confer about and propose to the Court, which is as follows:

- Interrogatories and document requests must be served by November 28, 2022;
- Any further amendment of pleadings shall be due by March 14, 2023;
- Requests for admissions must be served by April 15, 2023; and
- Depositions must be completed by May 15, 2023;¹
- The close of fact discovery shall be on May 15, 2023.

The parties are prepared to discuss this proposal, as well as the possibility of potential settlement, at the scheduled conference.

The parties thank Your Honor for the Court's attention to these matters.

Respectfully submitted,

/S/

Gideon Orion Oliver

¹ Prior to the start of depositions, the Parties will request a settlement conference if there is not one already scheduled.